

August 9, 1997

Mr. Michael Sewell
Air Quality Engineer
Monterey Bay Unified Air
Pollution Control District
24580 Silver Cloud Court
Monterey, CA 93940

Dear Mr. Sewell,

Thank you for the opportunity to review the proposed Monterey Bay Unified Air Pollution Control District (MBUAPCD) Title V permit for the Trical, Inc. fumigant formulation and packaging facility located in Hollister, California. This letter will provide EPA's comments on the proposed permit.

1. There is a typographical error contained in Condition 9. This record keeping requirement for "fumigant formulation" should be applied to Condition 4, not Condition 3.
2. Conditions 3 and 4 are derived from MBUAPCD Rule 416 which covers photochemically reactive and non-photochemically reactive solvent containing materials. These conditions contain emission limits in pound per day and pounds per hour terms. The record keeping requirements in the permit that are designed to ensure compliance with these limits have frequencies of daily only. Thus, it is not explicitly clear how compliance with the pound per hour limits will be ensured.

As required by part 70, the permit must contain "compliance certification, testing, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of the permit." Periodic monitoring must be "sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit..." The selection of monitoring should be based on a technical showing of whether the additional monitoring will assure compliance with the permit. However, the concept of assuring compliance does not necessarily mandate additional monitoring. Where no additional monitoring is required, the permitting authority should provide justifications based on a technical showing that compliance can be assured without monitoring because the units will not violate the limits.

In this case (Trical), the engineering evaluation should contain more detail about material usage at the facility and explain how the volumes of materials used for normal operations at the fumigant packaging and paint spray units ensure compliance with hourly emission limits. The engineering evaluation serves as the primary technical support document to the permit and can help clarify issues not intuitively obvious from the permit alone. Currently, the engineering

evaluation claims that "compliance is assumed" for hourly limits at the fumigant packaging unit since "any emission releases are lost profits for the facility" and that "compliance is assumed" for hourly limits at the paint spray unit "based on the limited material usage at the facility." These justifications are not sufficient to ensure compliance. Thus, more detail about material usage in the fumigant packaging unit and the amounts of non-reactive and reactive photochemical containing solvents used at the paint spray booth should be included in the engineering evaluation. Perhaps a description of any physical or operational limitations (similar to the analysis conducted for PM) on these two operations would help in clarifying the sufficiency of daily record keeping for hourly limits.

Please do not hesitate to call Paul Carroll of my staff at (415) 744-1148 if you have any questions.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division
U.S. EPA, Region 9

cc: Trical, Inc.